

### REMARKS

The invention relates to an apparatus for indicating time with at least one first pointer and a second pointer. Summarily, the first pointer provides a local time indication with a revolution period of twelve hours, and the second pointer provides a world time indication with a revolution period of twenty-four hours in cooperation with a dial with a number of graduations that is a multiple of 24.

As explained in the application, the invention combines an apparatus that may be described as indicating time in the manner that has become a world standard for use with (one or more) revolving first pointers, combined with a second pointer that indicates local time at the same or another location, but which revolves twice as slow as the slowest first pointer. As explained in the application, if the time of the second pointer has been set, the distinction between the two times will always be clear more or less immediately. Such distinction provides for better communication, appointment schedules, and the like, when communicating with persons in a different time zone or the like, because the times can be read out immediately for both time zones in an intuitively correct manner.

In the preferred embodiment, the first pointer provides a very fine resolution through the use of a standard three-pointer set, which can provide a resolution below a second. The second pointer surrenders much of this resolution, for example, somewhere in the range of four minutes. Through this surrender, the readings of the first and second

pointers are decoupled from each other, which advantageously minimizes confusion between the two readings.

In the Office Action mailed June 2, 2006, the claims stand rejected under 35 USC §103(a) over U.S. Patent No. 6,579,004 to Kim (hereinafter “Kim”) in view of U.S. Patent No. 1,807,497 to Speciale (hereinafter “Speciale”). Applicant respectfully disagrees with the Examiner’s analysis.

More particularly, Kim discloses more or less standard watch configuration (Figure 2) with an hour hand (or pointer) 1, a minute hand 2 and a second hand 3. Furthermore, there is a “beat” hand 4 that indicates Internet time 35 with a scale that indicates 1000 beats, and which hand rotates once a day. In contrast, the second pointer of the claims of the present invention provides a world time indication with a revolution period of twenty-four hours in cooperation with a dial with a number of graduations that is a multiple of 24. This feature is clearly distinctive from the “1000” beat indication of the beat hand and the beat dial of Kim. It is also an improvement over the configuration of Kim as users of the present invention can readily associate the graduations of the dial of the present invention with the world time, whereas user of Kim are required to translate the “1000” beat indication into a world time.

The reference to Speciale does not remedy the shortcomings of Kim. More particularly, Speciale discloses an arrangement with two pointers that both share a 24-hour period of rotation. The two pointers are used to indicate time for two different

locations by amending the angle between the two pointers. The configuration of Speciale clearly suffers from the limitation that confusion between the two readings will be likely as only the color of the two pointers distinguishes the two readings. Of course, the pointers may get a distinguishing shape, but this will not produce the intuitive recognition offered by configuration of the present invention. Moreover, Speciale clearly lacks the high resolution of the local time indication of the first pointer as recited in the claims.

Applicants note that extending Kim with Speciale's features would add a 24 hour rotatable pointer with two hands, which would be useless. It would be completely unclear what the second pointer would then mean in the sense of the Internet beat. Stated otherwise, Kim could get a double hour pointer, which would only render the reading of the timepiece more confusing. From the above arguments, the combining of Kim with all or part of the Speciale features would appear completely illogical, and the advantageous arrangement of the present invention could only be attained by hindsight or selectively picking only those aspects from two unrelated references that make the present invention a functioning device.

The further references are irrelevant to the present invention.

The present invention is furthermore non-obvious over the references. In a crowded technical field of analog timepieces, several hundred years have seen designers and engineers construct and design all kinds of improvements and modifications. The Speciale reference, by way of example is more than 75 years old. Nevertheless, none of

this big body of references has arrived at the principle of the present invention, to wit, the combining of two pointers, wherein one revolves in twelve hours and the other in twenty-four hours, and so allowing the intuitive and immediate read-out of local time though a standardized format, combined with a not so familiar format for reading a non-local time that sacrifices the standard twelve hour rotation and thereby much of the resolution, but instead results in the complete unequivocal read-out. Thus, the present invention has provided a timepiece that fully independently contains two watches, one at a high resolution, and one at a much lower resolution that has proved adequate for most situations that occur in the fields of business, traveling, conferencing, and many others.

Thus, the cited references fail to teach or suggest important limitations of the claims for the present invention. For these reasons, the claims of the present invention are patentable over the cited prior art.

With respect to Applicant's priority claim, Applicant made such a claim in the declaration filed in the present application on September 28, 2004. Applicant respectfully submits that such priority claim provides a reference to the related prior applications in compliance with 37 CFR 1.78(a). In the amendment presented above, Applicant has amended the first paragraph of the present application to reference such related applications. Applicant respectfully submits that this issue is now moot.

The drawings are objected to under 37 CFR 1.83(a) as failing to show the features of claims 14-16. Applicant has amended the drawings and specification to show the

features of claims 14-16. Such features are described on page 7 of the present application as originally filed. No new matter has been added. Applicant respectfully submits that this issue is now moot.

In light of all of the above, it is submitted that the claims are in order for allowance, and prompt allowance is earnestly requested. Should any issues remain outstanding, the Examiner is invited to call the undersigned attorney of record so that the case may proceed expeditiously to allowance.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jay P. Sbröllini". The signature is fluid and cursive, with the first name "Jay" and last name "Sbröllini" clearly distinguishable.

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